

PARKER IBRAHIM & BERG LLP

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October 31, 2023

VIA CM/ECF

Chief U.S. Bankruptcy Judge Magdeline D. Coleman
United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 202
Philadelphia, PA 19107

Re: In re. Cynthia Cieri, Case No. 23-10034-mdc

Dear Chief Judge Coleman:

This office represents JPMorgan Chase Bank, N.A. ("Chase") in connection with the Motion For Sanctions for Violation of the Automatic Stay (the "Motion") filed by Debtor Cynthia Cieri ("Debtor"), which is scheduled for a hearing on November 14, 2023. *See* Docket Nos. 51 and 54. Please accept this correspondence in lieu of a more formal response to the Motion.

At this time, the parties are actively engaged in settlement discussions and undersigned counsel is hopeful that the parties will be able to reach an amicable resolution prior to the November 14, 2023 hearing on the Motion. In the event that the parties' efforts are unsuccessful, however, Chase writes to respectfully inform the Court that Chase opposes the relief sought by the Motion and intends to appear at the Hearing in order to oppose same.

We thank the Court for its time and consideration. Undersigned counsel is available should you have any questions or concerns.

Respectfully submitted,

/s/ Fred W. Hoensch

Fred W. Hoensch, Esq.

cc: Michael I. Assad, Esq., counsel for Debtor (via CM/ECF)

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